

ESTTA Tracking number: **ESTTA683025**

Filing date: **07/10/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92057413
Party	Defendant Ellie Nahum
Correspondence Address	SHAHIN S KARIMIAN KARIMIAN LAW GROUP 21051 DUMETZ ROAD WOODLAND HILLS, CA 91364 UNITED STATES SK@Karimianlg.com
Submission	Request to Withdraw as Attorney
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Date	07/10/2015
Attachments	Withdrawal of Attorney USPTO V3.pdf(117930 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Registration No. 4278610

For the Mark: TRAP

Date Registered: January 22, 2013

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WILLIAM JONES)	
)	
Petitioner,)	Cancelation No. 92057413
)	
v.)	
)	
ELLIE NAHUM)	
Registrant)	
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MOTION TO WITHDRAW AS ATTORNEY OF RECORD

The undersigned attorney (Karimian Law Group) hereby requests permission to withdraw as attorney of record in the above captioned matter.

**WITHDRAWAL IS MANDATORY IF THE PRACTITIONER IS DISCHARGED
BY THE CLIENT.**

37 CFR § 1040 (b) (4) states that a practitioner representing a client before the Office shall withdraw from employment if the practitioner is discharged by the client.

The client stated that he wanted the office to stop working on the case because he could no longer afford services. I told the client that I would work with him on payment of fees however that option was declined and I was again asked to stop working on the case.

**PERMISSIVE WITHDRAWAL SHOULD BE GRANTED IF 37 CFR § 1040 (b) (4) IS
NOT ALLOWED**

37 CFR § 1040 (c) provides that if paragraph (b) of this section is not applicable, a practitioner may not request permission to withdraw in matters pending before the Office unless such a request is for any of the reasons below.

A. Permissive withdraw should be granted because client renders it unreasonably difficult for the practitioner to carry out the employment effectively

37CFR § 1040 (1)(vi) states that if a client by other conduct renders it unreasonably difficult for the practitioner to carry out the employment effectively.

The client has been unresponsive for at least a few months prior to termination in regards to this case. It was difficult to contact the client in any manner. The office tried phone, text, email and US mail. Almost all communications were ignored and went unanswered.

As such, the client's conduct has rendered it unreasonably difficult for the practitioner to carry out the employment effectively.

B. Permissive Withdraw should be granted because practitioner's client knowingly and freely assents to termination of the employment.

37 CFR § 1040 (5) The practitioner's client knowingly and freely assents to termination of the employment

As discribed above, the client stated that he wanted the office to stop working on the case because he could no longer afford services. I told the client that I would work with him on payment of fees however that option was declined and I was again asked to stop working on the case.

As such, the client has knowingly and freely assented to termination of employment.

C. The Trademark Trial and Appeals board will find existence of other good cause for withdrawal.

37 CFR § 1040 (6) states that permissive withdraw is allowed if the TTAB will find existence of other good cause for withdrawal.

I have not been able to meet with or get a hold of the client for many months now. The client has since changed his phone number and has stopped responding to emails and letters. The client has not communicated back about this case and became increasingly difficult to coordinate with and work for. Practitioner and the undersigned office literally felt that they could not effectively and properly complete their job as they saw fit.

The aforementioned issues gives rise to an existence of good cause for withdrawal.

In accordance with 37 CFR § 1040 (a), the practitioner has taken reasonable steps to avoid foreseeable prejudice to the rights of the client, including giving due notice to his or her client, allowing time for employment of another practitioner, delivering to the client all papers and property to which the client is entitled, and complying with applicable laws and rules. No unearned fees remain in the possession of practitioner.

Wherefore, Karimian Law Group requests to be relieved as attorney of record for the above captioned matter before the Trademark Trial and Appeals Board, that the examining attorney agrees that Karimian Law Group should be relieved as attorney of record pursuant to 37 CFR § 1040 (b)(4) or 37 CFR § 1040 (c).

Dated: July 10, 2015

Respectfully submitted,

By: /Shahin S. Karimian/
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Attorney for Registrant Ellie Nahum

CERTIFICATE OF SERVICE

It is hereby certified that on July 10, 2015 a true and correct copy of the foregoing motion was served and sent by upload to the USPTO website and email to opposing counsel, Michael Sloan, and sent to Ellie Nahum at 1421 Bedford Street, Unit 5, Los Angeles , CA 90036.

Dated: July 10, 2015

By:/Shahin S. Karimian/
Shahin Shawn Karimian